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State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

(217) 782-6760



November 3, 1994

Joseph D. Adams Jr., P.E.
Montgomery Watson
2100 Corporate Drive
Addison, IL 60101

Re: _0310420002 -- Cook Co.
Calumet Park/Chicago Copper and Chemical
Superfund/Technical Reports

Dear Mr. Adams,

The Agency has reviewed the Corrective Action Plan for the above referenced site. While the mechanical elements of this risk assessment remain excellent, the discussions and conclusions will need to be reinforced by physical measures.

1) The Agency will require groundwater monitoring in order to leave the hazardous levels of barium waste in place. This is because no evidence, analytical or modeled, has been provided to show that groundwater is protected at the site. Hazardous waste units are required to sample the groundwater for a number of years to monitor for the possible migration of wastes. The same requirement at this site will provide confidence that the Illinois Groundwater Standards are not exceeded.

The risk assessment concludes that the significant non-cancer risks are held in check because the barium will have a low solubility within the localized groundwater condition. This does not resolve the fact that testing shows leachable levels up to 16 times the hazardous waste level.

2) The Agency will require that the asphalt cutback material be sealed and periodically re-paved. This will assure the Agency that the hazardous waste cover will continue to control off-site migration via infiltration, run-off and wind deposition.

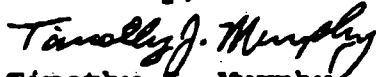
3) The future use of the site must be controlled through a deed restriction. There is a "For Sale" sign present on the site. Sale of the site would clearly limit the influence of the current owner's responsibility to #1 and #2 above. The deed restriction will assure the Agency that environmental controls will be maintained and future use of the site will be consistent with limiting the risk to human health and the environment.

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4) The Agency requires that every effort be made to locate and properly abandon the on-site well following the IDPH guidelines. This will prevent the well from becoming a conduit for contaminating groundwater.

5) Please add to the Corrective Action Plan the details of a groundwater monitoring plan, construction plans on sealing and maintaining the asphalt cover and the proposed wording to deed restriction. Also include verbiage that addresses #4 above. Please call if there are questions.

Sincerely,



Timothy S. Murphy

Project Manager, Remedial Project Management Section, Bureau of Land

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